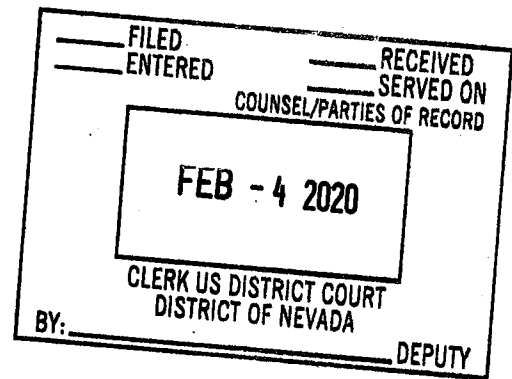




SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**



NICHOLAS A. TRUTANICH
United States Attorney
Nevada State Bar Number 13644
ALLISON REESE
Nevada State Bar Number 13977
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
FAX: (702) 388-5087
allison.reese@usdoj.gov

Attorneys for the Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RENATO CONSUEGRA-CLEMENTE,
Aka "Tito," and
FRANCISCO JAIVER MARES
Aka "Pancho,"

Defendants.

**SEALED
CRIMINAL INDICTMENT**

Case No. 2:20-cr- / 8

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(viii) —
Conspiracy to Distribute a Controlled Substance
(Methamphetamine)

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)—
Distribution of a Controlled Substance With Intent
to Distribute (Methamphetamine)

21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)—
Distribution of a Controlled Substance With Intent
to Distribute (Methamphetamine)

18 U.S.C. § 2 – Aiding and Abetting

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1 **THE GRAND JURY CHARGES THAT:**

2 **COUNT ONE**

3 (Conspiracy to Distribute a Controlled Substance—Methamphetamine)

4 Beginning at a date unknown and continuing up to and including October 30, 2019, in the
5 State and Federal District of Nevada,

6 **RENATO CONSUEGRA-CLEMENTE, Aka “Tito,” and**
7 **FRANCISCO JAIVER MARES, Aka “Pancho,”**

8 defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with
9 each other and with persons known and unknown to commit an offense against the United States,
10 to wit: to distribute 500 grams or more of a mixture and substance containing a detectable amount
11 of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States
12 Code, Sections 846 and 841(a)(1), (b)(1)(A)(viii).

13 **COUNT TWO**

14 (Distribution of a Controlled Substance—Methamphetamine)

15 On or about October 23, 2019, in the State and Federal District of Nevada,

16 **RENATO CONSUEGRA-CLEMENTE, Aka “Tito,” and**
17 **FRANCISCO JAIVER MARES, Aka “Pancho,”**

18 defendants herein, aiding and abetting one another, did knowingly and intentionally distribute
19 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine,
20 a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1)
21 and (b)(1)(B)(viii) and Title 18, United States Code, Section 2.

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COUNT THREE

(Distribution of a Controlled Substance—Methamphetamine)

On or about October 29, 2019, in the State and Federal District of Nevada,

**RENATO CONSUEGRA-CLEMENTE, Aka “Tito,” and
FRANCISCO JAIVER MARES, Aka “Pancho,”**

defendants herein, aiding and abetting one another, did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii) and Title 18, United States Code, Section 2.

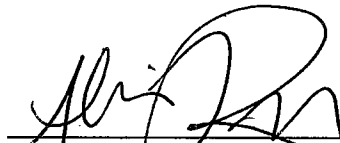
DATED: this 4th day of February, 2020.

A TRUE BILL:

/S/

FOREPERSON OF THE GRAND JURY

NICHOLAS A. TRUTANICH
United States Attorney



ALLISON REESE
Assistant United States Attorney